

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

H. CRISTINA CHEN-OSTER; SHANNA
ORLICH; ALLISON GAMBA; and MARY DE
LUIS,

Plaintiffs,

-against-

GOLDMAN, SACHS & CO. and THE
GOLDMAN SACHS GROUP, INC.,

Defendants.

No. 10-cv-6950-AT-RWL

**DECLARATION OF ANNE B. SHAVER IN SUPPORT OF PLAINTIFFS' OPPOSITION
TO DEFENDANTS' MOTION FOR DECERTIFICATION**

I, Anne B. Shaver, declare:

1. I am an attorney at Lieff Cabraser Heimann & Bernstein, LLP, Class Counsel for Plaintiffs and the Class in the above-captioned class action. I am a member in good standing of the bar of California, and I have been admitted to this case *pro hac vice*. This Declaration is submitted in support of Plaintiffs' Opposition to Defendants' Motion for Decertification. I make these statements based on personal knowledge and would so testify if called as a witness.

2. Attached hereto as **Exhibit 1** is a true and correct copy of GS0621389.

3. Attached hereto as **Exhibit 2** is a true and correct copy of GS0375741.

4. Attached hereto as **Exhibit 3** is a true and correct copy of GS0547082.

5. Attached hereto as **Exhibit 4** is a true and correct copy of GS0888961.

6. Attached hereto as **Exhibit 5** is a true and correct copy of GS0574442.

7. Attached hereto as **Exhibit 6** is a true and correct copy of GS0600235, along with its cover email, GS0600233, which explains that Exhibit 6 is a presentation to the Board of Directors.

8. Attached hereto as **Exhibit 7** is a true and correct copy of GS1023919.

9. Attached hereto as **Exhibit 8** is a true and correct copy of GS0567448.

10. Attached hereto as **Exhibit 9** is a true and correct copy of GS0637316.

11. Attached hereto as **Exhibit 10** is a true and correct copy of GS0590524.

12. Attached hereto as **Exhibit 11** is a true and correct copy of GS0685472.

13. Attached hereto as **Exhibit 12** is a true and correct copy of GS0616392.

14. Attached hereto at **Exhibit 13** is a true and correct copy of GS0910007.

15. Attached hereto as **Exhibit 14** is a true and correct copy of GS0684228.

16. Attached hereto as **Exhibit 15** is a true and correct copy of GS0614981.

17. Attached hereto as **Exhibit 16** is a true and correct copy of GS0484728.
18. Attached hereto as **Exhibit 17** is a true and correct copy of GS0380249.
19. Attached hereto as **Exhibit 18** is a true and correct copy of excerpts of the transcript of the November 13, 2020 Deposition of Erika Irish Brown.
20. After the Court's arbitration order (ECF No. 1264), the size of the class is approximately 2,160, of which 694 are Equity Award Holders who will have the right to opt-out of arbitration. Thus, depending on how many Equity Award Holders opt out of arbitration, the class size will be between 1,466 and 2,160.

* * *

I declare under penalty of perjury under the laws of the United States, the State of New York, and the State of California that the foregoing is true and correct to the best of my knowledge and that this declaration was executed in Denver, Colorado on September 24, 2021.

s/ Anne B. Shaver
Anne. B. Shaver